Nick Smith
EP Graphics
169 South Jefferson Street
Berne, Indiana 46711

Re: 001-10374
First Significant Permit Revision to
FESOP 001-5957-00039

Dear Nick Smith:

EP Graphics was issued a permit on December 11, 1996 for a commercial lithographic printing source. A letter requesting changes to this permit was received on November 11, 1998. Pursuant to the provisions of 326 IAC 2-8-11.1 a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document.

The following are the changes made as the First Significant Permit Revision for this source (additions will appear in bold print, deletions will appear in strikeout):

1. removal of the 100% capture efficiency requirements from presses 62 and 66 because a recent EPA guidance allows the source to assume 100% capture of all ink emissions generated and 70% capture of the VOCs generated by the fountain solution provided the source achieve and maintain a negative pressure drop across all dryer inlets and outlets. In addition, EP Graphics has proposed that 0% capture efficiency for all other solutions used in the printing operation;

The preventive maintenance plan, originally Condition D.1.5, will now be Condition D.1.3.

D.1.~~5~~ **3** Preventive Maintenance Plan [326 IAC 2-8-4(9)]
A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of the permit is required for this facility and its control device.

Condition D.1.4 will be amended as follows:

D.1.~~3~~ **4** Compliance Stack Tests
Compliance stack tests shall be performed on the catalytic oxidizers C1 and C2 for VOCs within 24 to 36 months of the issuance of this **First Significant Permit Revision to the** FESOP. These tests shall be repeated once every five years. Stack tests that were performed on these units within the last 6 months, ~~pursuant to the requirements of CP #001-4963~~, **utilizing methods as approved by the Commissioner**, ~~shall~~ **may** satisfy the stack testing requirements for these units during this permit term. These tests shall be performed using methods approved by the OAM.

Condition D.1.5 will be amended as follows:
D.1.~~4~~ **5** Catalytic Oxidizer
That pursuant to CP-001-4963, issued on April 1, 1996, and 326 IAC 2-8-4, the 0.36 million Btu per hour and 0.053 million Btu per hour natural gas fired catalytic oxidizers, **identified as C1,**

and C2, respectively, shall be in operation at all times when press #62 and press #66 are in operation. ~~When operating, the thermal oxidizers shall maintain a minimum operating temperature of 650 F, or the temperature determined in the compliance tests to maintain at least 90% destruction of VOC captured~~. ~~The temperature of the exhaust from the catalytic oxidizer shall be recorded continuously whenever the facility is operating. In the event of malfunction of the temperature recorder, to the extent practicable, intermittent monitoring of the parameter shall be implemented at intervals no less than one hour until such time as the continuous monitor is back in operation~~. **The incinerators shall be operated and maintained such that**:

(a) each catalytic incinerator achieves a minimum operating temperature of 650° F, or a temperature, as determined in the most recent compliance stack tests, that achieves and maintains a minimum 90% destruction of the VOC captured, and

(b) each catalytic incinerator achieves a negative air flow pressure to the dryer relative to the surrounding room as indicated by differential pressure gauges across the dryer inlets and outlets. To demonstrate that a negative air flow pressure is achieved on a continuous basis, the Permittee shall install differential pressure gauges at each of the dryer inlets and outlets, and measure and record the differential pressure across the inlets and outlets of the #62 and #66 dryers at least once per shift. Maintaining a negative pressure across the dryer inlets and outlets shall yield the following capture efficiencies for presses #62 and #66:

(1) one hundred percent (100%) capture of the VOCs emitted by the heatset inks not retained by the substrate; and

(2) seventy percent (70%) capture of the VOCs emitted from alcohol substitutes in the fountain solutions.

Condition D.1.6 was added to the permit:

D.1.6 Catalytic Oxidizers

To document compliance with Condition D.1.5, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be complete and sufficient to establish compliance with the Compliance Monitoring requirements established in Condition D.1.5. These records shall contain a minimum of the following:

(1) records of the catalytic oxidizer operating parameters including the VOC destruction efficiency of each control device and a description of the data used to establish the capture and destruction efficiencies;

(2) records of the catalytic oxidizer temperature for both C1and C2 on a daily basis;

(3) records of the differential pressure across the dryer inlets and outlets as specified in Condition D.1.5(b). The records shall be kept using differential pressure gauges with one inlet of each gauge being within the dryer and the other inlet of the gauge being open to the ambient air in the press room; and

(4) records of the dryer temperature. The records shall be kept using an

electronic data management system (EDMS) which shall be installed and operated to record the instantaneous temperature on a frequency of not less than every hour. As an alternative to installing an EDMS, manual readings shall be taken every one hour;

All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

The old condition D.1.6 will be deleted. Condition D.1.7 will be added to the permit:

~~D.1.5 Volatile Organic Compound (VOC) Usage~~

~~That the Permittee shall maintain records at the source of the materials used that contain any VOCs. The records shall be complete and sufficient to establish compliance with the VOC usage limits and VOC emission limits established in this permit. The records shall contain a minimum of the following:~~

~~(a) The weight of VOC containing material used, including purchase orders and invoices necessary to verify the type and amount used;~~

~~(b) The VOC content (weight percent) of each material used;~~

~~(c) The weight of VOCs emitted for each compliance period, considering capture and control efficiency, if applicable; and~~

~~(d) the following operation parameters of the catalytic oxidizer;~~

~~(1) VOC capture efficiency;~~

~~(2) VOC destruction efficiency of the control device;~~

~~(3) A description of the data used to establish the capture and destruction efficiencies;~~

~~(4) Continuous or intermittant temperature and fan amperage readings; and~~

~~(5) Maintain daily records at the stationary source of the operating temperature of the oxidizers.~~

D.1.7 Volatile Organic Compounds (VOC) Usage

(a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) The cleanup solvent usage for each month;

(3) The total VOC usage for each month; and

(4) The weight of VOCs emitted for each compliance period.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

The old condition D.1.7 was deleted. Condition D.1.8 was added to the permit:

~~D.1.6 Hazardous Air Pollutants (HAP)~~

~~That the Permittee shall maintain records at the source of the materials used that contain any VOCs. The records shall be complete and sufficient to establish compliance with the HAP usage limits and HAP emission limits established in this permit. The records shall contain a minimum of the following:~~

~~(a) The weight of HAP containing material used, including purchase orders and invoices necessary to verify the type and amount used;~~

~~(b) The HAP content (weight percent) of each material used;~~

~~(c) The weight of HAPs emitted for each compliance period, considering capture and control efficiency, if applicable; and~~

~~(d) the following operation parameters of the catalytic oxidizer;~~

~~(1) HAP capture efficiency;~~

~~(2) HAP destruction efficiency of the control device;~~

~~(3) A description of the data used to establish the capture and destruction efficiencies;~~

~~(4) Continuous or intermittant temperature and fan amperage readings; and~~

~~(5) Maintain daily records at the stationary source of the operating temperature of the oxidizers.~~

D.1.8 Hazardous Air Pollutants

(a) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP usage limits and/or the HAP emission limits established in Condition D.1.2.

(1) The amount and HAP content of each coating material and solvent

used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) The cleanup solvent usage for each month;

(3) The total HAP usage for each month;

(4) The weight of HAPs emitted for each compliance period; and

(5) Identification of the facility or facilities associated with the usage of each HAP.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Condition D.1.9 will have its wording updated to the more current wording:

D.1.~~7~~ **9** Quarterly Reporting
~~That a quarterly summary to document compliance with operation condition number D.1.1 and D.1.2 shall be submitted, using the enclosed forms or their equivalent, within thirty (30) days after the end of the quarter being reported.~~

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

2. removal of any conditions in the construction permit or FESOP that require temporary total enclosure or any capture tests because the negative pressure and 0% capture efficiency requirements in "1." above negate the requirement for demonstration of capture efficiency;

No changes were made related to this comment.

3. allow the use of a 20% retention factor for the VOCs in the heatset inks;

Conditions D.1.1 and D.1.2 were amended as follows:

D.1.1 Volatile Organic Compounds
That pursuant to 326 IAC 2-8-4 (FESOP), the total VOC input to printing presses (#55, 56, 57, 60, 62, 63, 65, and 66) and to the associated clean-up operations shall be limited to 90.53 tons per twelve consecutive months. (For presses #62 and #66, there are catalytic oxidizers for controls. For these two (2) presses, the VOC input would be determined after the effect of the catalytic oxidizer). Therefore, the requirements of 326 IAC 2-7 do not apply.

To determine the VOC input, the source shall be allowed:

(a) a VOC retention factor of 20% for the heatset inks.

D.1.2 Hazardous Air Pollutants
The hazardous air pollutant emissions shall be limited as follows:

(a) The amount of any single hazardous air pollutant (HAP) input to the printing operation and associated cleanup activities shall be limited to less than 10 tons per twelve (12) consecutive months.

(b) The amount of any combination of HAPs input to the printing operation and associated cleanup activities shall be limited to less than 25 tons per twelve (12) consecutive months.

(c) For presses #62 and #66, there are catalytic oxidizers for controls. For these two (2) presses, the HAP input may be determined after the effect of the catalytic oxidizer.
To determine the HAP input, the source shall be allowed:

(1) a HAP retention factor of 20% for the heatset inks.

4. Delete the Construction Permit Requirements of Construction Permit CP 001-4963-00039, issued on April 1, 1996, that conflict with the revisions made to FESOP F001-5957-00039, issued on December 11, 1996;

This is accomplished with the associated construction permit change included with this significant permit revision. Condition 10 is amended as follows:

That one (1) catalytic incinerator, known as C2, shall operate at all times that the printing press #66 is operated. When operating, the catalytic incinerator shall maintain a minimum operating temperature, of 650^{o} F or a temperature **and differential pressure across the dryer inlets and outlets**, determined in the compliance tests, ~~fan amperage, and duct velocity~~ (described in Condition 3) to maintain a minimum 90% destruction of the volatile organic compound (VOC) captured. ~~In addition, the capture efficiency of the VOC emissions from the printing press #66 prior to incineration shall be maintained at100% as determined in compliance tests.~~

5. include the VOC (HAP) emissions not accounted for in the original construction permit (CP 001-4963-00039), issued on April 1, 1996, and the Federally Enforceable State Operating Permit (F001-5957-00039), issued on December 12, 1996.

This adjustment has been made.

The following construction conditions are applicable to the proposed project:

1. General Construction Conditions
   The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Management (OAM).

2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

3. Effective Date of the Permit
   Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the significant permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Donald R. Poole, OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for DR Poole or extension (2-8327), or dial (317) 232-8327.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments
sdf/drp
cc: File - Adams County
U.S. EPA, Region V
Adams County Health Department
Air Compliance Section Inspector - Jim Thorpe
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

SECTION D.1 FACILITY OPERATION CONDITIONS

One (1) web fed lithographic press, identified as press #55, with a maximum capacity of 15.55 million square inches per hour, exhausting to general ventilation. One (1) web fed lithographic press, identified as press #60, with a maximum capacity of 16.42 million square inches per hour, exhausting at one (1) stack, identified as S2. One (1) web fed lithographic press, identified as press #62, with a maximum capacity of 54.72 million square inches per hour, equipped with a 0.036 million Btu per hour catalytic oxidizer, exhausting at one (1) stack, identified as S3. One (1) web fed lithographic press, identified as press #63, with a maximum capacity of 36.29 million square inches per hour, exhausting at one (1) stack, identified as S4. One (1) web fed lithographic press, identified as press #66, with a maximum capacity of 62.20 million square inches per hour, equipped with a 0.053 million Btu per hour catalytic oxidizer, exhausting at one (1) stack, identified as S5. One (1) sheet fed lithographic press, identified as press #65, with a maximum capacity of 2.60 million square inches per hour. One (1) web fed lithographic press, identified as press #56, with a maximum capacity of 15.55 million square inches per hour. One (1) web fed lithographic press, identified as press #57, with a maximum capacity of 18.14 million square inches per hour.

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Volatile Organic Compounds

That pursuant to 326 IAC 2-8-4 (FESOP), the total VOC input to printing presses (#55, 56, 57, 60, 62, 63, 65, and 66) and to the associated clean-up operations shall be limited to 90.53 tons per twelve consecutive months. (For presses #62 and #66, there are catalytic oxidizers for controls. For these two (2) presses, the VOC input would be determined after the effect of the catalytic oxidizer). Therefore, the requirements of 326 IAC 2-7 do not apply.

To determine the VOC input, the source shall be allowed:

(a) a VOC retention factor of 20% for the heatset inks.

D.1.2 Hazardous Air Pollutants

The hazardous air pollutant emissions shall be limited as follows:

(a) The amount of any single hazardous air pollutant (HAP) input to the printing operation and associated cleanup activities shall be limited to less than 10 tons per twelve (12) consecutive months.

(b) The amount of any combination of HAPs input to the printing operation and associated cleanup activities shall be limited to less than 25 tons per twelve (12) consecutive months.

(c) For presses #62 and #66, there are catalytic oxidizers for controls. For these two (2) presses, the HAP input may be determined after the effect of the catalytic oxidizer. To determine the HAP input, the source shall be allowed:

(1) a HAP retention factor of 20% for the heatset inks.

D.1.3 Preventive Maintenance Plan

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Testing Requirements [326 IAC 2-8-4(3)]

D.1.4 **Compliance Stack Tests**

Compliance stack tests shall be performed on the catalytic oxidizers C1 and C2 for VOCs within 24 to 36 months of the issuance of this First Significant Permit Revision to the FESOP. These tests shall be repeated once every five years. Stack tests that were performed on these units within the last 6 months, utilizing methods as approved by the Commissioner, may satisfy the stack testing requirements for these units during this permit term. These tests shall be performed using methods approved by the OAM.

Compliance Monitoring Requirements [326 IAC 2-8-5(a)(1)]

D.1.5 Catalytic Oxidizers

That pursuant to CP-001-4963, issued on April 1, 1996, and 326 IAC 2-8-4, the 0.36 million Btu per hour and 0.053 million Btu per hour natural gas fired catalytic oxidizers, identified as C1, and C2, respectively, shall be in operation at all times when press #62 and press #66 are in operation. The incinerators shall be operated and maintained such that:

(a) each catalytic incinerator achieves a minimum operating temperature of 650^{o} F, or a temperature, as determined in the most recent compliance stack tests, that achieves and maintains a minimum 90% destruction of the VOC captured, and

(b) each catalytic incinerator achieves a negative air flow pressure to the dryer relative to the surrounding room as indicated by differential pressure gauges across the dryer inlets and outlets. To demonstrate that a negative air flow pressure is achieved on a continuous basis, the Permittee shall install differential pressure gauges at each of the dryer inlets and outlets, and measure and record the differential pressure across the inlets and outlets of the #62 and #66 dryers at least once per shift. Maintaining a negative pressure across the dryer inlets and outlets shall yield the following capture efficiencies for presses #62 and #66:

(1) one hundred percent (100%) capture of the VOCs emitted by the heatset inks not retained by the substrate; and

(2) seventy percent (70%) capture of the VOCs emitted from alcohol substitutes in the fountain solutions.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.1.6 Catalytic Oxidizers

To document compliance with Condition D.1.5, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be complete and sufficient to establish compliance with the Compliance Monitoring requirements established in Condition D.1.5. These records shall contain a minimum of the following:

(1) records of the catalytic oxidizer operating parameters including the VOC destruction efficiency of each control device and a description of the data used to establish the capture and destruction efficiencies;

(2) records of the catalytic oxidizer temperature for both C1and C2 on a daily basis;

(3) records of the differential pressure across the dryer inlets and outlets as specified in Condition D.1.5(b). The records shall be kept using differential pressure gauges with one inlet of each gauge being within the dryer and the other inlet of the gauge being open to the ambient air in the press room; and

(4) records of the dryer temperature. The records shall be kept using an electronic data management system (EDMS) which shall be installed and operated to record the instantaneous temperature on a frequency of not less than every hour. As an alternative to installing an EDMS, manual readings shall be taken every one hour;

All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.7 Volatile Organic Compounds (VOC) Usage

(a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) The cleanup solvent usage for each month;

(3) The total VOC usage for each month; and

(4) The weight of VOCs emitted for each compliance period.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.8 Hazardous Air Pollutants (HAP)

(a) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP usage limits and/or the HAP emission limits established in Condition D.1.2.

(1) The amount and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) The cleanup solvent usage for each month;

(3) The total HAP usage for each month;

(4) The weight of HAPs emitted for each compliance period; and

(5) Identification of the facility or facilities associated with the usage of each HAP.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.9 Quarterly Reporting

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2 FACILITY OPERATION CONDITIONS

One (1) bindery machine, equipped with a cyclone in series with a baghouse for dust control, identified as DC1, with a maximum capacity of 26,323 cubic feet per minute exhaust rate.

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Particulate Matter

That pursuant to 326 IAC 6-3 (Process Operations), the particulate matter emissions from the bindery operation shall not exceed 2.94 pounds per hour.

D.2.2 Cyclone Baghouse Requirements

That pursuant to 326 IAC 6-3 (Process Operations), the cyclone and baghouse dust collectors shall be in operation at all times when the binding process is in operation. At all times when the baghouse is in operation, the baghouse outlet air shall not exceed 10% opacity. Failure or partial failure of control devices shall be reported to IDEM according to the procedure specified for malfunctions in 326 IAC 1-6-2, in which case the provisions of 326 IAC 1-6-5 may apply at the discretion of IDEM.

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) OFFICE OF AIR MANAGEMENT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 1-800-451-6027

EP Graphics
169 South Jefferson Street
Berne, Indiana 46711

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the facilities listed in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 and contains the conditions and provisions specified in 326 IAC 2-8 and 40 CFR Part 70.6 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments) and IC 13-15 and IC 13-17 (prior to July 1, 1996, IC 13-1-1-4 and IC 13-7-10).

Operation Permit No.: F001-5957-00039	
Issued by: Felicia R. George, Assistant Commissioner Office of Air Management	Issuance Date: December 11, 1996

First Significant Permit Revision: 001-10374-00039	Affected Pages: 1, 4, 22, 23, 24, 25, 25a
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

SECTION A SOURCE SUMMARY

A.1 General Information [326 IAC 2-8-3(c)]
The Permittee owns and operates a commercial lithographic printing facility.

Responsible Official:	Nick Smith
Source Address:	169 South Jefferson Street, Berne, Indiana 46711
Mailing Address:	169 South Jefferson Street, Berne, Indiana 46711
SIC Code:	2752
County Location:	Adams
County Status:	Attainment for all criteria pollutants
Source Status:	Synthetic Minor Source, FESOP Program

A.2 Emission Units and Pollution Control Summary [326 IAC 2-8-3(c)]
The stationary source consists of the following emission units and pollution control devices:

(a) One (1) web fed lithographic press, identified as press #55, with a maximum capacity of 15.55 million square inches per hour, exhausting to general ventilation.

(b) One (1) web fed lithographic press, identified as press #60, with a maximum capacity of 16.42 million square inches per hour, exhausting at one (1) stack, identified as S2.

(c) One (1) web fed lithographic press, including one (1) overcoating process, identified as press #62, with a maximum capacity of 54.72 million square inches per hour, equipped with a 0.036 million Btu per hour catalytic oxidizer, exhausting at one (1) stack, identified as S3.

(d) One (1) web fed lithographic press, identified as press #63, with a maximum capacity of 36.29 million square inches per hour, exhausting at one (1) stack, identified as S4.

(e) One (1) web fed lithographic press, including one (1) overcoating process, identified as press #66, with a maximum capacity of 62.20 million square inches per hour, equipped with a 0.053 million Btu per hour catalytic oxidizer, exhausting at one (1) stack, identified as S5.

(f) One (1) bindery machine, equipped with a cyclone in series with a baghouse for dust control, identified as DC1, with a maximum capacity of 26,323 cubic feet per minute exhaust rate.

A.3 Insignificant Activities [326 IAC 2-8-3(c)(3)(I)]
This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(20):

(a) Activities with potential VOC emissions less than or equal to 15 pounds per day:

(1) One (1) sheet fed lithographic press, identified as press #65, with a maximum capacity of 2.60 million square inches per hour.

7. That pursuant to 326 IAC 6-3 (Process Operations), the cyclone and baghouse dust collectors shall be in operation at all times when the binding process is in operation, and shall not exceed the allowable particulate matter (PM) emission rate of 27.7 pounds per hour.

8. That the cyclone connected in series with the baghouse shall be operated at all times when the binding process is in operation. At all times when the baghouse is in operation, the baghouse outlet air shall not exceed 10% opacity. Failure or partial failure of control devices shall be reported to IDEM according to the procedure specified for malfunctions in 326 IAC 1-6-2, in which case the provisions of 326 IAC 1-6-5 may apply at the discretion of IDEM.

9. That pursuant to 326 IAC 2-1-3(j), records of surface coating quantities and organic solvent contents shall be maintained for a minimum period of 24 months and made available upon request of the Office of Air Management (OAM). Any change or modification which may increase potential emissions to 250 tons per year from the equipment covered in this permit shall obtain a Prevention of Significant Deterioration (PSD) permit pursuant to 326 IAC 2-2 before such change may occur.

10. That one (1) catalytic incinerator, known as C2, shall operate at all times that the printing press #66 is operated. When operating, the catalytic incinerator shall maintain a minimum operating temperature, of 650^{o} F or a temperature and differential pressure across the dryer inlets and outlets, determined in the compliance tests (described in Condition 3) to maintain a minimum 90% destruction of the volatile organic compound (VOC) captured.

11. That the volatile organic compounds (VOC) emissions from each of the five (5) printing press facilities, known as presses #57, 60, 62, 63, and 65, shall not exceed the potential emissions at maximum rated capacity. Therefore, 326 IAC 8-1-6 requirements will not apply to these presses.

CONSTRUCTION PERMIT
OFFICE OF AIR MANAGEMENT

EP Graphics
169 South Jefferson Street
Berne, IN 46711

is hereby authorized to construct

the equipment listed in the Page 2 of this permit.

This permit is issued to the above mentioned company (herein known as the Permittee) under the provisions of 326 IAC 2-1 and 40 CFR 52.780, with conditions listed on the attached pages.

Construction Permit No.: CP-001-4963-00039	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: 04-01-96

Construction Permit No.: CP-001-10374-00039	Affected Page: 5
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document for First Significant Permit Revision
of the Federally Enforceable State Operating Permit (FESOP)

Source Background and Description

Source Name: EP Graphics
Source Location: 169 South Jefferson Street, Berne, Indiana 46711
County: Adams
Permit No.: F001-5957-00039, Issued December 11, 1996
Revision No. AF 001-10374-00039
SIC Code: 2752
Permit Reviewer: SDF

Proposed Changes:

On November 11, 1998, EP Graphics filed for a revision to existing permit F001-5957-00039, issued on December 11, 1996. After review of the proposed revision, the following are the changes proposed as the First Significant Revision for this source:

1. removal of the 100% capture efficiency requirements from presses 62 and 66 because a recent EPA guidance allows the source to assume 100% capture of all ink emissions generated and 70% capture of the VOCs generated by the fountain solution provided the source achieve and maintain a negative pressure drop across all dryer inlets and outlets. In addition, EP Graphics has proposed that 0% capture efficiency for all other solutions used in the printing operation;

2. removal of any conditions in the construction permit or FESOP that require temporary total enclosure or any capture tests because the negative pressure and 0% capture efficiency requirements in 1. above negate the requirement for demonstration of capture efficiency;

3. allow the use of a 20% retention factor for the VOCs in the heatset inks and that 50% of the input VOCs from the roller washing process be considered fugitive with the remaining 50% sent to a waste disposal site;

4. Delete the Construction Permit Requirements of Construction Permit CP 001-4963-00039, issued on April 1, 1996, that conflict with the revisions made to FESOP F001-5957-00039, issued on December 11, 1996;

5. include the VOC (HAP) emissions not accounted for in the original construction perm
4963-00039), issued on April 1, 1996, and the Federally Enforceable State Operating P
(F001-5957-00039), issued on December 12, 1996.

Response to Proposed Changes:

1. Removal of the 100% capture efficiency requirements from presses 62 and 66, 70% capture of the VOCs generated by the fountain solution, and use of 0% capture efficiency for all other solutions used in the printing operation:

EP Graphics has submitted a document from John Seitz, USEPA Office of Air Quality Planning and Standards (QAQPS), EPA, to Gary Jones of the Graphic Arts Technical Foundation (GATF) relating to VOC emissions from heatset web offset printing operations.

This document states if a heatset web offset dryer is operating at negative pressure, then all of the heatset web offset lithographic printing ink oils that are not retained in the substrate can be assumed to be captured in the dryer and available for delivery from the dryer to a control device.

Thus, it is determined that a negative air flow pressure is an adequate means of achieving 100% capture efficiency for the heatset web offset dryers of this source (dryers of Presses #62 and

#66) provided the source owner or operator:

1. achieves a negative air flow pressure across each dryers inlets and outlets,
2. conducts testing to establish the proper operating parameters,
3. Properly monitors the differential pressure across th
4. keeps records of the differenti
5. provides

While the EPA guidance does allow a negative air flow pressure across the dryer inlets and outlets as a substitute for 100% capture, the negative pressure substitute only applies to printing ink oils that are not retained in the substrate. All other VOC generating components must achieve 100% capture efficiency if controls are being used to limit the VOC emissions.

EP Graphics has therefore proposed 0% control for all other solutions associated with Presses #62 and #66. This is determined to be acceptable provided that owner or operator:

1. keep sufficient records of the input VOC and HAP from these solutions demonstrating that compliance to the VOC and HAP limits established in FESOP Conditions D.1.1 and D.1.2 is being achieved, and
2. Submits quarterly reports demonstrating compliance with the VOC and HA Conditions D.1.1 and D.1.2.

Finally, EP Graphics has proposed 70% capture of the VOCs generated by the fountain solution. According to the EPA guidance, 70 percent direct carryover of VOC from alcohol substitutes in fountain solutions is a reasonable assumption.

Thus, it is determined that 70% capture of the VOCs generated from alcohol substitutes in fountain solution is acceptable provided the 70% capture applies to alcohol substitutes only.

In order to accommodate the above requested changes to the permit, the following amendments shall be made to the permit:

The preventive maintenance plan, originally Condition D.1.5 shall be moved to the most recent position in the permit, as Condition D.1.3:

D.1.53 Preventive Maintenance Plan [326 IAC 2-8-4(9)]
A Preventive Maintenance Plan, in accordance with Section B - Preventive M Plan, of this permit, is required for this facility and its control device.

All subsequent conditions shall be renumbered accordingly.

The testing requirements of Condition D.1.3 (now Condition D.1.4) shall be changed to require stack testing of Press #62 and press #66. The compliance stack tests shall be performed to determine the operating parameters necessary to achieve the desired destruction efficiency and negative air flow pressure.

The source has requested that the reference made in this condition to the testing requirements of the construction permit be removed. The requirements of this condition require the construction permit reference to make it enforceable. Therefore, the construction permit reference shall remain in the FESOP condition.

The language allowing use of stack tests conducted in the last six months shall be left in the condition because it is determined that said testing shall be deemed acceptable provided the testing conducted satisfies the requirements of the Commissioner.

D.1.34 Compliance Stack Tests
Compliance stack tests shall be performed on the catalytic oxidizers C1 and 24 to 36 months of the issuance of this First Significant Revision to this FES shall be repeated once every five years. Stack tests that were performed on the last 6 months, pursuant to the requirements of CP #001-4963, shall may testing requirements for these units during this permit term provided that the are approved by the Commissioner. These tests shall be performed using m

by the OAM.

Condition D.1.4 (now Condition D.1.5) shall be amended to

1. update the requirement so as to reflect more current language,
2. add the operating parameters that will achieve and maintain the negative and
3. add the monitoring requirements necessary to demo negative air flow pressure on a continuous basis.

The source has requested the removal of the FESOP construction permit reference from Condition D.1.4 (now Condition D.1.5). The requirements of this condition require the construction permit reference to make it enforceable. Therefore, the construction permit reference shall remain in FESOP Condition D.1.4 (now Condition D.1.5). It is noted that Operation Condition 10 of the construction permit has been amended to eliminate any conflicting requirements between the construction permit and the FESOP that have surfaced due to the changes allowed by the EPA guidance.

D.1.45 Catalytic Oxidizer

That pursuant to CP-001-4963, issued on April 1, 1996, and 326 IAC 2-8-4, per hour and 0.053 million Btu per hour natural gas fired catalytic oxidizers, i and C2, respectively, shall be in operation at all times when the press #62 a operation. When operating, the thermal oxidizers shall maintain a minimum temperature of 650 F, or the temperature determined in the compliance test 90% destruction of VOC captured. The incinerators shall be operated and m that:

(a) each catalytic incinerator achieves a minimum operating temperature of 650o F, or a temperature, as determined in the most recent compliance stack tests, that achieves and maintains a minimum 90% destruction of the VOC captured, and

(b) each catalytic incinerator achieves a negative air flow pressure to the dry the surrounding room as indicated by differential pressure gauges across th inlets and outlets. To demonstrate that a negative air flow pressure is achiev continuous basis, the Permittee shall install differential pressure gauges at e the dryer inlets and outlets, and measure and record the differential pressur the inlets and outlets of the #62 and #66 dryers at least once per shift. Maint negative pressure across the dryer inlets and outlets shall yield the following efficiencies for presses #62 and #66:

(1) one hundred percent (100%) capture of the VOCs emitted by the heatset inks not retained by the substrate; and

(2) seventy percent (70%) capture of the VOCs emitte fountain solutions.

A condition (Condition demonstrate that a ne a continuous basis. T requirements establis request.

D.1.6 Catalytic Oxidizers

To document compliance with Condition D.1.5, the Permittee shall maintain accordance with (1) through (3) below. Records maintained for (1) through (complete and sufficient to establish compliance with the Compliance Monito requirements established in Condition D.1.5. these records shall contain a m the following:

(1) records of the catalytic oxidizer operating parameters including the VOC destruction

efficiency of each control device and a description of the data used to establish the capture and destruction efficiencies;

(2) records of the differential pressure across the dryer inlets and outlets as specified in Condition D.1.5(b). The records shall be kept using differential pressure gauges with one inlet of each gauge being within the dryer and the other inlet of the gauge being open to the ambient air in the press room; and

(3) records of the dryer temperature. The records shal
management system (EDMS) which shall be installed
instantaneous temperature on a frequency of not less
alternative to installing an EDMS, manual readings sha

All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

The VOC record keeping requirements of Condition D.1.5 (now D.1.7) shall:

1. be updated to most current standard language,

2. be changed to only require records of the parameters that are necessary
compliance with the VOC limitations of Condition D.1.1, and

3. include a log of the rollerwash VOC input from all sc
D.1.1(b), including records of each rollerwash solvent
rollerwash solvent shipped off site for disposal, and re
wash solvent generates VOC emissions of 50% or less.

D.1.5 Volatile Organic Compound (VOC) Usage
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That the Permittee shall maintain records at the source of the materials used
VOCs. The records shall be complete and sufficient to establish compliance
limits and VOC emission limits established in this permit. The records shall c
of the following:

(a) The weight of VOC containing material used, including purchase orders and invoices necessary to verify the type and amount used;

(b) The VOC content (weight percent) of each material used;

(c) The weight of VOCs emitted for each compliance period, considering capture and control efficiency, if applicable; and

(d) the following operation parameters of the catalytic oxidizer;

(1) VOC capture efficiency;

(2) VOC destruction efficiency of the control device;

(3) A description of the data used to establish the capture and destruction efficiencies;

(4) Continuous or intermittant temperature and fan amperage readings; and

(5) Maintain daily records at the stationary source of the operating temperature of the oxidizers.

D.1.7 Volatile Organic Compound (VOC) Usage

(a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS)

necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The cleanup solvent usage for each month;

(4) The total VOC usage for each month;

(5) The weight of VOCs emitted for each compliance period; and

(6) a log of the rollerwash VOC input from all solvents associated with Condition D.1.1(b), including records of the types of rollerwash solvent used, the composite vapor pressure at 20 C, the amount of each rollerwash solvent used, each respective amount of rollerwash solvent shipped off site for disposal, and records demonstrating that each roller wash solvent generates VOC emissions of 50% or less.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Condition D.1.6 (now Condition D.1.8) shall:

1. be updated to most current standard language,

2. be changed to only require records of the parameters that are necessary
compliance with the HAP limitations of Condition D.1.2, and

3. include a log of the rollerwash HAP input from all so
D.1.2(b), including records of each rollerwash solvent
rollerwash solvent shipped off site for disposal, and re
wash solvent generates VOC emissions of 50% or less.

D.1.6 H

(a) The weight of HAP containing material used, including purchase orders and invoices necessary to verify the type and amount used;

(b) The HAP content (weight percent) of each material used;

(c) The weight of HAPs emitted for each compliance period, considering capture and control efficiency, if applicable; and

(d) the following operation parameters of the catalytic oxidizer;

(1) HAP capture efficiency;

(2) HAP destruction efficiency of the control device;

(3) A description of the data used to establish the capture and destruction efficiencies;

(4) Continuous or intermittant temperature and fan amperage readings; and

(5) Maintain daily records at the stationary source of the operating temperature of the oxidizers.

D.1.8 Hazardous Air Pollutants

(a) To document compliance with Condition D.1.2, the Permittee shall maintain records in

accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP usage limits and/or the HAP emission limits established in Condition D.1.2.

(1) The amount and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The cleanup solvent usage for each month;

(4) The total HAP usage for each month;

(5) The weight of HAPs emitted for each compliance period;

(6) a log of the rollerwash HAP input from all solvents associated with Condition D.1.1(b), including records of the types of rollerwash solvent used, the composite vapor pressure at 20 C, the amount of each rollerwash solvent used, each respective amount of rollerwash solvent shipped off site for disposal, and records demonstrating that each roller wash solvent generates HAP emissions of 50% or less; and

(7) Identification of the facility or facilities associated with the usage of each HAP.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Condition D.1.7 (now Condition D.1.9) shall be modified to the most current standard language:

D.1.7 9 Quarterly Reporting

That a quarterly summary to document compliance with operation condition number D.1.1 and D.1.2 shall be submitted, using the enclosed forms or their equivalent, within thirty (30) days after the end of the quarter being reported.

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

2. removal of any conditions in the construction permit or FESOP that require temporary total enclosure or any capture tests because the negative pressure and 0% capture efficiency requirements in 1. above negate the requirement for demonstration of capture efficiency;

The stack testing requirement of construction permit 001-4963-00039, issued on April 1, 1996, is condition 3, which does not specify the type of testing required, only that stack testing would be required using the source sampling procedures. Thus, no changes to this condition are necessary.

The stack testing condition of FESOP 001-5957-00039, issued December 11, 1996, is Condition D.1.3, which again, does not specify the type of testing required, but does reference the construction permit. The construction permit reference shall therefore be removed because the FESOP should not have referenced the Construction Permit to establish the operating permit requirements.

3. Allowing the use of a 20% retention factor for the VOCs in the heatset inks and that 50% of

the VOCs from the roller washing process be considered fugitive with the remaining 50% sent to a waste disposal site:

EP Graphics has proposed that the source be allowed a 20% retention factor for the heatset inks due to the fact that the EPA guidance allows the source to do so. EP Graphics also requests that the source be allowed to have at most, a 50% VOC emission rate for solvents used at the rollerwash process.

Upon review of the EPA guidance, the FESOP and the construction permit, it is determined that the proposed 20% retention factor shall be allowed. No record keeping or reporting are required due to the fact that the EPA guidance allows the source to do so and the VOC and HAP record keeping requirements of FESOP Conditions D.1.7 and D.1.8 shall provide the information necessary to determine if the source is using the 20% retention factor or not.

Therefore, the rollerwash solvent 50% emission rate shall be acceptable provided that the source:

1. keep appropriate records, and

2. be able to demonstrate upon request that the solvents are achieving less emission rate.

To institute the above proposed retention factor and emission rate, the following changes will be made:

The 20% VOC retention factor and 50% VOC input rate shall be added to Conditions D.1.1 and D.1.2. Conditions D.1.1 and D.1.2 shall also be updated to more current language.

D.1.1 Volatile Organic Compounds

That pursuant to 326 IAC 2-8-4 (FESOP), the total VOC input to printing pre 60, 62, 63, 65, and 66) and to the associated clean-up operations shall be li per twelve consecutive months. (For presses #62 and #66, there are catalyti controls. For these two (2) presses, the VOC input would be determined afte catalytic oxidizer). Therefore, the requirements of 326 IAC 2-7 do not apply.

To determine the VOC input, the source shall be allowed:

(a) a VOC retention factor of 20% for the heatset inks, and

(b) at most, a VOC input rate of 50% for all solvents from the roller wash pro composite vapor pressures less than 10 mm Hg at 20o C, provided that the complies with the requirements of Condition D.1.7(a)(6) and can demonstra request, that the input generated from the roller washing process is less tha to 50%.

D.1.2 Hazardous Air Pollutants

The hazardous air pollutant emissions shall be limited as follows:

1. The amount of any single hazardous air pollutant (HAP) input to the printing operation and associated cleanup activities shall not exceed 9.00 be limited to less than 10 tons per twelve (12) consecutive months.

2. The amount of any combination of HAPs input to the printing operation and associated cleanup activities shall not exceed 22.00 be limited to less than 25 tons per twelve (12) consecutive months.

3. For presses #62 and #66, there are catalytic oxidizers for controls. For these two (2) presses, the HAP input would may be determined after the effect of the catalytic oxidizer.

To determine the HAP input, the source shall be allowed:

(a) a HAP retention factor of 20% for the heatset inks, and

(b) at most, a HAP input rate of 50% for all solvents from the rolle

composite vapor pressures less than 10 mm Hg at 20o C, provid
complies with the requirements of Condition D.1.8(a)(6) and can
request, that the input generated from the roller washing process
to 50%.

4. Delete the Construction Permit Requirements of Construction Permit CP 001-4963-00039, issued on April 1, 1996, that conflict with the revisions made to FESOP F001-5957-00039, issued on December 11, 1996.

Upon review of the operating conditions of the existing construction permit it is determined that only two portions of Operation Condition 10 conflict with the EPA guidance and the proposed changes.

Condition 10 references fan amperage and duct velocity which are no longer necessary to demonstrate compliance with the capture efficiency requirements. A negative pressure drop across the dryer inlets and outlets via the EPA guidance achieves 100% capture efficiency.

Continuous demonstration of the negative pressure drop across the dryer inlets and outlets shall be achieved by monitoring and recording the pressure drop across the dryer inlets and outlets at least once per shift, with records of these measurements being kept and made available upon request. These requirements make the fan amperage and duct velocity requirements not necessary. Thus, the fan amperage and duct velocity requirements shall be deleted from Condition 10.

Condition 10 also requires the source to achieve 100% capture efficiency. As previously stated, the EPA guidance allows a negative pressure drop across the dryer inlets and outlets as a substitute for 100% capture. Thus, the 100% capture efficiency requirements shall be removed.

No other parts of Condition 10 conflict with the FESOP or the EPA guidance. Therefore, all other portions of Condition 10 shall remain the same. It should be noted that the FESOP include a catalytic incinerator for press # 62 which has identical destruction and negative pressure requirements. However, press #62 is not included in Condition 10 of the construction permit because the press #62 requirements were added after the construction permit and do not belong there.

Condition 10 shall therefore be amended as follows:

That one (1) catalytic incinerator, known as C2, shall operate at all times that the printing press #66 is operated. When operating, the catalytic incinerator shall maintain a minimum operating temperature, of 650o F or a temperature and differential pressure across the dryer inlets and outlets, determined in the compliance tests, fan amperage, and duct velocity (described in Condition 3) to maintain a minimum 90% destruction of the volatile organic compound (VOC) captured. In addition, the capture efficiency of the VOC emissions from the printing press #66 prior to incineration shall be maintained at100% as determined in compliance tests.

5. Include the VOC (HAP) emissions not accounted for in either the original construction permit (CP 001-4963-00039), issued on April 1, 1996, nor in the Federally Enforceable State Operating Permit (F001-5957-00039), issued on December 12, 1996.

In the original construction permit (CP 001-4963-00039), issued on April 1, 1996, there were some emissions that were not accounted for in the determination of the potential emissions. The emissions, VOC (HAP) emissions from the overcoating process of press #66 therefore will be accounted for in this significant revision as follows:

The following calculations determine the VOC (HAP) emissions from the overcoating operation based on the worst case VOC and HAP materials, maximum usage of 0.000249 gal/unit, a maximum production rate of 144,000 sq ft/hr, emissions before controls, and 8,760 hours of operation:

lb/gal * %VOC * gal/sq ft * sq ft/hr * 8760 hr/yr * 1/2000 ton/lb = ton/yr

Worst Case VOC Coating Emissions:

Material	lb/gal	%VOC	gal/sq ft	sq ft/hr	tons/yr
268-699	8.28	0.125	0.000249	144,000	162.55

Worst Case HAP Coating Emissions:

Material	lb/gal	%HAP	gal/sq ft	sq ft/hr	tons/yr
1119A	8.94	0.0776	0.000249	144,000	108.95

Based on the new emissions, the emissions tables are adjusted to include the new emissions.

Permit Condition Corrections

*Operation Condition 8 of Construction Permit 001-4963, issued on April 1, 1996, lists requirements applicable to the cyclone/baghouse associated with the bindery machine. This condition was not included in the FESOP, 001-5957-00039, issued on December 11, 1996. Therefore, these requirements shall be included in Section D.2 of the FESOP as Condition D.2.2. The condition shall read as follows:

D.2.2 Cyclone Baghouse Requirements

That pursuant to 326 IAC 6-3 (Process Operations), the cyclone and baghouse dust collectors shall be in operation at all times when the binding process is in operation. At all times when the baghouse is in operation, the baghouse outlet air shall not exceed 10% opacity. Failure or partial failure of control devices shall be reported to IDEM according to the procedure specified for malfunctions in 326 IAC 1-6-2, in which case the provisions of 326 IAC 1-6-5 may apply at the discretion of IDEM.

* This condition was found on Page 25 of the FESOP. However, due to changes to Section D.1, Page 25 has moved up one page. This additional page shall be numbered 25a.

Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility.

Pollutant	Potential Emissions (tons/year)
PM	0.041
PM-10	0.1639
SO2	0.014
VOC	212.58 375.13
CO	0.508
NOx	2.42

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in cor

HAPs	Potential Emissions (tons/year)
Glycol Eth	6.73 115.68
Vinyl Aceta	0.02
Ethylene G	0.01
Styrene	0.02
TOTAL	109.00115.73

The source VOC emissions are limited to 99 tons per year pursuant to 326 IAC 2-8, so no new limitations are required to limit the VOC emissions that were not accounted for in the original application.

The source single HAP emissions are limited to less than 10 tons per year and the combined HAP emissions are limited to less than 25 tons per year. Thus, no limitations are required to limit the additional HAP emissions not accounted for in the original permit.

All other emissions are the same as originally proposed.

Enforcement Issue

None. Since the source was granted a source 99 ton/yr limit for VOC, a single source HAP limit of less than 10 ton/yr, and a combined HAP limit of less than 25 ton/yr, the increased potential emissions due to the oversight were also limited. Further, the increased potential did not cause the source to violate any existing permit requirements, or trigger any new applicable requirements. Thus, no enforcement referral is necessary in this case.

Recommendation

The staff recommends to the Commissioner that the modification be approved.

Information, unless otherwise stated, used in this review was derived from the application and additional information submitted by the applicant.

Federal Rule Applicability

There are no changes in Federal rule applicability from the original FESOP.

State Rule Applicability

The 326 IAC 8-1-6 BACT requirement for 100% capture has been removed and changed to reflect new EPA guidance recommendations that only a negative pressure drop is required across the dryer inlets. See Response to Proposed Changes, 1. above.

Conclusion

The modifications of this source will be subject to the conditions of the attached proposed FESOP Significant Permit Revision No.: 001-10374-00039.

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azardous Air Pollutant

That the Permittee shall maintain records at the source of the materials used that contain any VOCs. The records shall be complete and sufficient to establish compliance with the HAP usage limits and HAP emission limits established in this permit. The records shall contain a minimum of the following:

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Indiana Department of Environmental Management
Office of Air Management

Addendum to the
Technical Support Document for the First Significant Permit Revision of the Federally Enforceable State Operating Permit (FESOP)

Source Name:	EP Graphics
Source Location:	169 South Jefferson Street, Berne, Indiana 46711
County:	Adams
Construction Permit No.:	CP-001-10374-00039
SIC Code:	2752
Permit Reviewer:	Scott Fulton/drp

On July 19, 1999, the Office of Air Management (OAM) had a notice published in the Decatur Daily Democrat in Decatur, Indiana, stating that EP Graphics had applied for a significant permit revision to their FESOP. This revision was for the removal of several conditions and the addition of some emissions not accounted. The notice also stated that OAM proposed to issue a permit for this installation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On August 9, 1999, EP Graphics submitted comments on the proposed significant permit revision. The summary of the comments and corresponding responses is as follows:

Comment #1 In Section A.1, the responsible official is Nick Smith.

Response #1 This change of the responsible official's name shall be made.

Comment #2 In Sections D.1.1(b), D.1.2(c)(2), D.1.7(a)(6), and D.1.8(a)(6), all of these sections deal with the requirement that no more than 50% of all solvents used in the rollerwash process be allowed to be emitted into the atmosphere. There apparently is some confusion on IDEM's part. Rollerwash is a clean up solvent that is manually applied to the rollers. There is no mechanism to capture any of the vapors from the rollerwash system. Therefore, it will not be possible for EP Graphics to commit to 50% retention of rollerwash used. We are proposing that the rollerwash be treated as other solvents in the system and that zero capture rate be applied. The indicated sections should be deleted and the rollerwash should be treated as other solutions associated with presses 62 and 66 and be subject to zero percent control. Records of VOC and HAP emissions will be maintained and reported as other solvents in the system.

Response #2 The requested changes shall be made. Sections D.1.1(b), D.1.2(c)(2), D.1.7(a)(6), and D.1.8(a)(6) will be amended to eliminate the 50% factor for the rollerwash solvents.

Comment #3 In Section D.1.4, EP Graphics is requesting that a stack test performed within twelve months be allowed to be utilized for demonstrating of compliance. EP Graphics performed tests in October of 1998 and March of 1999 to demonstrate compliance with its construction and FESOP permits. These tests should be allowed to be used to demonstrate compliance with the proposed modification language.

Response #3 The recognition of these recent tests is evidenced by the language in the condition, "Stack tests that were performed on these units within the last 6 months utilizing methods as approved by the Commissioner, may satisfy the stack testing requirements for these units during this permit term." OAM Compliance Data Section will determine if these recent tests are acceptable for determining compliance with this condition.

Comment #4 In Sections D.1.7(a)(2) and D.1.8(a)(2), it is unnecessary to request a log of dates of use. Paragraphs 1, 3, 4, and 5 of this section are sufficient to document VOC usage on a monthly basis.

Response #4 The requirement for a log of the dates of use in conditions D.1.7(a)(2) and D.1.8 (a)(2) shall be removed from the permit. There is no volume weighted daily averaging requirement or other daily requirement in the permit to merit such a requirement.

Additionally, the OAM has determined that the following changes need to be made to the permit:

A condition will be added to the permit to require that the source will maintain daily records of the operating temperature of the catalytic oxidizers to show that they have achieved the 650 degrees F minimum operating temperature. This will be condition D.1.6(2).